



A04-0051 6/4/01

***National
Environmental
Achievement Track***

Application Form

Brown & Williamson Tobacco Corporation
Macon, Georgia Facility

Name of facility

British American Tobacco

Name of parent company (if any)

2600 Weaver Road

Street address

Street address (continued)

Macon, Georgia 31217

City/State/Zip code

Give us information about your contact person for the
National Environmental Achievement Track Program.

Name Herb Prizer

Title Senior Manager, Environment, Health & Safety

Phone 478-464-3689

Fax 478-464-8786

E-mail herb_prizer@bat.com

Why do we need this information?

EPA needs background information on your facility to evaluate your application.

What do you need to do?

- Provide background information on your facility.
- Identify your environmental requirements.

Section A

Tell us about your facility.

1 What do you do or make at your facility?

Manufacture Cigarettes

2 List the Standard Industrial Classification (SIC) code(s) or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.

SIC
2111

NAICS
312221

3 Does your company meet the Small Business Administration definition of a small business for your sector?

☐ Yes

☒ No

4 How many employees (full-time equivalents) currently work at your facility?

☐ Fewer than 50

☐ 50-99

☐ 100-499

☐ 500-1,000

☒ More than 1,000 (approximately 2,300)

Section A, continued

5 Does your facility have an EPA ID number(s)?

☒ Yes

☐ No

If yes, list in the right-hand column.

GAD082169855

6 Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference. List your requirements to the right **or** enclose a completed Checklist with your application.

See Attached Checklist

7 Check the appropriate box in the right-hand column.

☐ I've listed the requirements above.

☒ I've enclosed the Checklist with my application.

8 Optional: Is there anything else you would like to tell us about your facility?

Our facility has made environmental, health and safety stewardship a priority as evidenced by the following awards and initiatives:

- Formal EMS in place since 1996 (BAT Roadmap)
- ISO 14000 Registration complete by May 2001
- Recommended by OSHA for membership in the OSHA Voluntary Protection Program (VPP) – formal entry expected by summer 2001.
- 1999 Macon Winner - Keep America Beautiful Award
- 1999 BAT Stewardship Award
- 2000 State of Georgia Department of Labor Award

Section B

Tell us about your EMS.

Why do we need this information?

Facilities must have an operating Environmental Management System (EMS) that meets certain requirements.

What do you need to do?

- Confirm that your EMS meets the Achievement Track requirements.
- Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS.

1 Check **yes** if your EMS meets the requirements for each element below as defined in the instructions.

a. Environmental policy

☒ Yes

b. Planning

☒ Yes

c. Implementation and operation

☒ Yes

d. Checking and corrective action

☒ Yes

e. Management review

☒ Yes

2 Have you completed at least one EMS cycle (plan-do-check-act)?

☒ Yes

3 Did this cycle include both an EMS and a compliance audit?

☒ Yes

4 Have you completed an objective self-assessment or third-party assessment of your EMS?

☒ Yes

If yes, what method of EMS assessment did you use?

☒ Self-assessment

☐ GEMI

☒ Other

☐ CEMP

☒ Third-party assessment

☐ ISO 14001 Certification

☒ Other (LawGibb Engineering and King & Spalding Attorneys-at-Law, 1997 and 1999)

ISO 14001 final registration audit conducted by BSI, Inc.
April 23 – April 27, 2001.

Section C

Tell us about your past achievements and future commitments.

Why do we need this information?

Facilities must show that they are committed to improving their environmental performance. This means that you can describe past achievements and will make future commitments.

What do you need to do?

Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.

1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you qualify as a small facility as defined in the instructions, you are required to report past achievement for at least one environmental aspect.

First aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?													
	Quantity	Units	Quantity	Units												
Recycled/Re-used Materials – Scrap Metal and Paper Recycling	81.3	Pounds/ton production	102.2	Pounds/ton production												
<p>i. <i>How is the current level an improvement over the previous level?</i></p> <p>The facility currently recycles 26% more scrap metal, cardboard, and paper than it did two years ago.</p>																
<table border="1"> <thead> <tr> <th>Year</th> <th>Scrap Material Recycling (pounds / ton production)</th> <th>% Improvement over baseline</th> </tr> </thead> <tbody> <tr> <td>1998</td> <td>81.3</td> <td>NA</td> </tr> <tr> <td>1999</td> <td>86.6</td> <td>6.6%</td> </tr> <tr> <td>2000</td> <td>102.2</td> <td>25.7%</td> </tr> </tbody> </table>					Year	Scrap Material Recycling (pounds / ton production)	% Improvement over baseline	1998	81.3	NA	1999	86.6	6.6%	2000	102.2	25.7%
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1998	81.3	NA														
1999	86.6	6.6%														
2000	102.2	25.7%														
<p>ii. <i>How did you achieve this improvement?</i></p> <p>This improvement was the result of additional waste segregation efforts, emphasis on finding beneficial reuse options for wastes, and a specific focus on reducing the amount of materials landfilled. The areas improved upon were scrap metal, scrap drums, cardboard, white paper and aluminum cans. The facility generated over \$300,000 in revenue from scrap material sales in 2000.</p>																

Second aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?										
Air Emissions – HCl releases reportable under TRI	Quantity 0.379	Units Pounds HCl/ton production	Quantity 0.342*	Units Pounds HCl/ton production									
<p>i. <i>How is the current level an improvement over the previous level?</i></p> <p>The facility has reduced that amount of HCl releases to the air (subsequently reported under TRI) by almost ten percent over the past two years.</p> <table border="1"> <thead> <tr> <th>Year</th> <th>Pounds of HCl released per ton of production</th> <th>% change compared to baseline</th> </tr> </thead> <tbody> <tr> <td>1998</td> <td>0.379</td> <td>NA</td> </tr> <tr> <td>2000*</td> <td>0.342</td> <td>9.8 %</td> </tr> </tbody> </table>					Year	Pounds of HCl released per ton of production	% change compared to baseline	1998	0.379	NA	2000*	0.342	9.8 %
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<p>ii. <i>How did you achieve this improvement?</i></p> <p>The HCl emission improvements stem from a reduction in coal burned to generate steam at the facility. Over recent years the plant has continued to convert to cleaner energy sources for steam generation (natural gas and purchased electricity), and made efforts to improve boiler operation and steam utilization efficiency.</p> <p>* Projected (2000 TRI report not filed at time of application)</p>													

- 2 Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this section.

Note to small facilities: If you are a small facility, you are required to make commitments for at least two environmental aspects in two different categories.

First aspect you've selected

a. What is the aspect?

Material Use – Reduced packaging material used in product

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A:
Absolute value 12,200,000 lbs./yr.
(Quantity/Units)

☐ Option B:
In terms of
units of production
or output (Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A:
Absolute value 10,700,000 lbs./yr.
(Quantity/Units)

☐ Option B:
In terms of
units of production
or output (Quantity/Units)

e. How will you achieve this improvement?

The improvement will result from the use of alternative packaging materials. The project will result in a reduction in post consumer solid waste of 1,500,000 pounds annually when fully implemented.

Second aspect you've selected

a. What is the aspect?

Hazardous Waste Reduction

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A:
Absolute value 75,400 lbs./yr. *
(Quantity/Units)

☐ Option B:
In terms of
units of production
or output (Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A:
Absolute value 50,000 lbs./yr.
(Quantity/Units)

☐ Option B:
In terms of
units of production
or output (Quantity/Units)

e. How will you achieve this improvement?

It cost Brown & Williamson over \$25,000 last year to dispose of its ethanol hazardous waste (D001). We also had internal costs for matters such as labeling, container purchase, container inspections, manifest tracking, waste report filing, and annual hazardous waste fees. The ethanol originates from a very clean, food grade process, and we consider it to be a good candidate for reuse or recycling. In addition, it is our hope to earn revenue by selling this material, or at worst, pay pennies on the dollar in comparison to what we currently pay for disposal. Furthermore, every gallon of ethanol we ship to a recycler or customer results in reduced consumption of virgin resources needed to produce ethanol. We have done preliminary work evaluating exemptions allowed under RCRA for this material and believe it may be exempt from hazardous waste classification if reused.

* The year 2000 generation rate has been reduced for the purpose of this application to reflect a one time waste event in 2000 realized from the removal of steam powered chillers at the facility (Lithium Bromide Solution – D007 material). The hazardous waste generation total for 2000 (116,000 lbs.) was uncharacteristically high and does not reflect normal operating conditions.

Third aspect you've selected

a. What is the aspect?

Material Reuse – Filter Tow

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A:
Absolute value 1,200,000 lbs./yr.
(Quantity/Units)

☐ Option B:
In terms of
units of production (Quantity/Units)
or output

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A:
Absolute value 600,000 lbs./yr.
(Quantity/Units)

☐ Option B:
In terms of
units of production (Quantity/Units)
or output

e. How will you achieve this improvement?

The improvements will stem from the beneficial reuse of product fabrication residual materials that are currently landfilled. This project would eliminate 600,000 pounds annually of waste previously landfilled.

Fourth aspect you've selected

a. What is the aspect?

Total Energy Use

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of

☐ Option A:
Absolute value

production or output.

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

e. How will you achieve this improvement?

- ☒ Option B:
In terms of
units of production
or output

(Quantity/Units)

16.70 Million BTU/ton
production
(Quantity/Units)
- ☐ Option A:
Absolute value

(Quantity/Units)
- ☒ Option B:
In terms of
units of production
or output

15.87 Million BTU/ton
production
(Quantity/Units)

Energy use reductions will be made through phase in of newer, more energy efficient equipment, consolidation of work schedules, and management initiatives designed to conserve energy. The facility is also working on efficiency improvements from cogeneration (the use of excess steam to create electricity). Additionally, the facility is considering the use of an external energy efficiency consultant who could make additional recommendations for energy savings.

Section D

Tell us about your public outreach and reporting.

Why do we need this information?

Facilities must demonstrate their commitment to public outreach and performance reporting. You should have appropriate mechanisms in place to identify community concerns, to communicate with the public, and to provide information on your environmental performance.

What do you need to do?

- Describe your approach to public outreach.
- List three references who are familiar with your facility.

1 How do you identify and respond to community concerns?

Individuals at the Macon facility participate in local community meetings held by the Macon Chamber of Commerce EHS Committee, Government Affairs Committee, and Military Affairs Committee. In these meetings, a Brown & Williamson representative is available to answer questions regarding environmental matters at the facility. A facility representative also participates on the Keep Macon-Bibb County Keep America Beautiful committee. The Brown & Williamson website also provides a link whereby questions on environmental matters at the Macon facility can be routed to a knowledgeable staff member.

2 How do you inform community members of important matters that affect them?

News releases and press conferences as warranted. The facility works with the local fire department on hazardous material storage issues. The facility also involves the local fire department in its annual evacuation drills and its routine fogging (pest control) events.

3 How will you make the Achievement Track Annual Performance Report available to the public?

☒ Website
<http://www.brownandwilliamson.com/BWT/Index.cfm?ID=71&Sect=3>

☐ Newspaper

☐ Open Houses

☐ Other

4 Are there any ongoing citizen suits against your facility? ☐ Yes ☒ No

If yes, describe briefly in the right-hand column.

5 List references below

	Organization	Name	Phone number
Representative of a Community/ Citizen Group	Keep Macon-Bibb County Beautiful	Patricia Robinson	(478) 751-7427
State/Local Regulator	Georgia Department of Natural Resources - EPD	Jac Capp	(404) 363-7143
	Georgia Department of Labor	Jimmy Mize	(404) 679-0687 x 110
	VPP Program Officer/CSHO	Thomas Bosley	(770) 493-6644
Other community/local reference	Macon Water Authority	Gene Holcomb – Executive Director	(478) 464-5620

Section E

Application and Participation Statement.

On behalf of Brown & Williamson Tobacco
Macon, Georgia Facility
[my facility],

I certify that

- I have read and agree to the terms and conditions, as specified in the *National Environmental Achievement Track Program Description* and in the *Application Instructions*;
- I have personally examined and am familiar with the information contained in this Application (including, if attached, the Environmental Requirements Checklist). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;
- My facility has an environmental management system (EMS), as defined in the Achievement Track EMS requirements, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date

Printed Name/Title Jeff Myhand / Senior Vice President Manufacturing & Operations

Facility Name Brown & Williamson Tobacco Corporation – Macon, Georgia Facility

Facility Street Address 2600 Weaver Road
Macon, Georgia 31217

Facility ID Numbers GAD082169855

National Environmental Achievement Track

Environmental Requirements Checklist

The following Checklist is provided to assist facilities in answering Section A, "Tell us about your facility," Question 6. The Checklist is given to help facilities identify the major federal, state, tribal, and local environmental requirements applicable at their facilities. The Checklist is not intended to be an exhaustive list of all environmental requirements that may be applicable at an individual facility.

If you use this Checklist and choose to submit it with your application, fill in your facility information below and enclose the completed Checklist with your application (see instructions).

Facility Name Brown & Williamson Tobacco
Facility Location: Macon, Georgia
Facility ID Number(s): EPA ID: GAD082169855
(attach additional sheets if necessary) AIRS: 04-13-0210055
TRI: 31298-BRWNW-2600W
D&B: 006378228

Air Pollution Regulations

Check All
That Apply

1. National Emission Standards for Hazardous Air Pollutants (40 CFR 61)
2. Permits and Registration of Air Pollution Sources
3. General Emission Standards, Prohibitions and Restrictions
4. Control of Incinerators
5. Process Industry Emission Standards
6. Control of Fuel Burning Equipment
7. Control of VOCs
8. Sampling, Testing and Reporting
9. Visible Emissions Standards
10. Control of Fugitive Dust
11. Toxic Air Pollutants Control
12. Vehicle Emissions Inspections and Testing

<input type="checkbox"/>
<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>
<input type="checkbox"/>
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<input checked="" type="checkbox"/>
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<input type="checkbox"/>
<input type="checkbox"/>

Other Federal, State, Tribal or Local Air Pollution Regulations Not Listed Above (identify)

13. Georgia Rules for Air Quality Control (391-3-1)
- 14.

<input checked="" type="checkbox"/>
<input type="checkbox"/>

Hazardous Waste Management Regulations

1. Identification and Listing of Hazardous Waste (40 CFR 261)
 - Characteristic Waste
 - Listed Waste
2. Standards Applicable to Generators of Hazardous Waste (40 CFR 262)
 - Manifesting
 - Pre-transport requirements

<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>

- Record keeping/reporting ☒
- 3. Standards Applicable to Transporters of Hazardous Waste (40 CFR 263)
 - Transfer facility requirements ☐
 - Manifest system and record-keeping ☐
 - Hazardous waste discharges ☐
- 4. Standards for Owners and Operators of TSD Facilities (40 CFR 264)
 - General facility standards ☐
 - Preparedness and prevention ☐
 - Contingency plan and emergency procedures ☐
 - Manifest system, Record keeping and reporting ☐
 - Groundwater protection ☐
 - Financial requirements ☐
 - Use and management of containers ☐
 - Tanks ☐
 - Waste piles ☐
 - Land treatment ☐
 - Incinerators ☐
- 5. Interim Status Standards for TSD Owners and Operators (40 CFR 265) ☒
- 6. Interim Standards for Owners and Operators of New Hazardous Waste Land Disposal Facilities (40 CFR 267) ☐
- 7. Administered Permit Program (Part B) (40 CFR 270) ☐

Other Federal, State, Tribal or Local Hazardous Waste Management Regulations Not Listed Above (identify)

- 8. Georgia Rules for Hazardous Waste Management (391-3-11) and (391-3-19) ☒
- 9. Georgia Hazardous Waste Reduction Plans (O.C.G.A. 12-8-65.1 – 12-8-65.4) ☒

Hazardous Materials Management

- 1. Control of Pollution by Oil and Hazardous Substances (33 CFR 153) ☐
- 2. Designation of Reportable Quantities and Notification of Hazardous Materials Spill (40 CFR 302) ☒
- 3. Hazardous Materials Transportation Regulations (49 CFR 172-173) ☒
- 4. Worker Right-to-Know Regulations (29 CFR 1910.1200) ☒
- 5. Community Right-to-Know Regulations (40 CFR 350-372) ☒

Other Federal, State, Tribal or Local Hazardous Materials Management Regulations Not Listed Above (identify)

- 6. Georgia Rules for Underground Storage Tank Management (391-3-15) ☒
- 7. Georgia Rules for Radioactive Materials Management (391-3-17) ☒
- 8. Georgia Rules for Asbestos Removal and Encapsulation (391-3-14) ☒
- 9. Oil or Hazardous Material Spills or Releases (O.C.G.A. 12-14-1 et seq.) ☒

Solid Waste Management

- 1. Criteria for Classification of Solid Waste Disposal Facilities and Practices (40 CFR 257) ☐
- 2. Permit Requirements for Solid Waste Disposal Facilities ☐
- 3. Installation of Systems of Refuse Disposal ☐
- 4. Solid Waste Storage and Removal Requirements ☐

5. Disposal Requirements for Special Wastes ☐

Other Federal, State, Tribal or Local Solid Waste Management Regulations Not Listed Above (identify)

6. Georgia Rules for Solid Waste Management (391-3-4-.04) ☒
7. ☐

Water Pollution Control Requirements

1. Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112) ☒
2. Designation of Hazardous Substances (40 CFR 116) ☒
3. Determination of Reportable Quantities for Hazardous Substances (40 CFR 117) ☒
4. NPDES Permit Requirements (40 CFR 122) ☒
5. Toxic Pollutant Effluent Standards (40 CFR 129) ☐
6. General Pretreatment Regulations for Existing and New Sources (40 CFR 403) ☒
7. Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 414) ☐
8. Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 415) ☐
9. Plastics and Synthetics Point Source Effluent Guidelines and Standards (40 CFR 416) ☐
10. Water Quality Standards ☒
11. Effluent Limitations for Direct Dischargers ☐
12. Permit Monitoring/Reporting Requirements ☒
13. Classifications and Certifications of Operators and Superintendents of Industrial Wastewater Plants ☒
14. Collection, Handling, Processing of Sewage Sludge ☐
15. Oil Discharge Containment, Control and Cleanup ☒
16. Standards Applicable to Indirect Discharges (Pretreatment) ☒

Other Federal, State, Tribal or Local Water Pollution Control Regulations Not Listed Above (identify)

17. Georgia Rules for Water Quality Control (391-3-6) ☒
18. Macon Water Authority – Rules Governing Use of Public Sewers ☒

Drinking Water Regulations

1. Underground Injection and Control Regulations, Criteria and Standards (40 CFR 144, 146) ☐
2. National Primary Drinking Water Standards (40 CFR 141) ☐
3. Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141) ☐
4. Permit Requirements for Appropriation/Use of Water from Surface or Subsurface Sources ☐
5. Underground Injection Control Requirements ☐
6. Monitoring, Reporting and Record keeping Requirements for Community Water Systems ☐

Other Federal, State, Tribal or Local Drinking Water Regulations Not Listed Above(identify)

7. ☐
8. ☐

Toxic Substances

1. Manufacture and Import of Chemicals, Record keeping and Reporting Requirements (40 CFR 704) ☐
2. Import and Export of Chemicals (40 CFR 707) ☐
3. Chemical Substances Inventory Reporting Requirements (40 CFR 710) ☐
4. Chemical Information Rules (40 CFR 712) ☐
5. Health and Safety Data Reporting (40 CFR 716) ☐
6. Pre-Manufacture Notifications (40 CFR 720) ☐
7. PCB Distribution Use, Storage and Disposal (40 CFR 761) ☐
8. Regulations on Use of Fully Halogenated Chlorofluoroalkanes (40 CFR 762) ☐
9. Storage and Disposal of Waste Material Containing TCDD (40 CFR 775) ☐

Other Federal, State, Tribal or Local Toxic Substances Regulations Not Listed Above
(identify)

10. ☐
11. ☐

Pesticide Regulations

1. FIFRA Pesticide Use Classification (40 CFR 162) ☐
2. Procedures for Disposal and Storage of Pesticides and Containers (40 CFR 165) ☐
3. Certification of Pesticide Applications (40 CFR 171) ☐
4. Pesticide Licensing Requirements ☐
5. Labeling of Pesticides ☐
6. Pesticide Sales, Permits, Records, Application and Disposal Requirements ☐
7. Disposal of Pesticide Containers ☐
8. Restricted Use and Prohibited Pesticides ☐

Note: All pesticides used at the facility are applied by a licensed third-party contractor.

Other Federal, State, Tribal or Local Pesticides Regulations Not Listed Above
(identify)

9. ☐
10. ☐

Environmental Clean-Up, Restoration, Corrective Action

1. Comprehensive Environmental Response, Compensation and Liability Act (Superfund) (identify) ☐
2. RCRA Corrective Action (identify) ☐

☐
☐

**Other Federal, State, Tribal or Local Environmental Clean-Up, Restoration,
Corrective Action Regulations Not Listed Above (identify)**

- 3.
- 4.

☐
☐